

This Privacy Notice describes how Blue Whale Finance collects and processes your personal information through the Blue Whale Finance websites and applications that reference this Privacy Notice. Blue Whale Finance refers to an ecosystem comprising BlueWhaleFinance.io websites (whose domain names include but are not limited to Blue Whale Finance), mobile applications, clients, applets and other applications that are developed to offer Blue Whale Finance Services, and includes independently-operated platforms, websites and clients within the ecosystem (e.g., Blue Whale Finance's Open Platform, Blue Whale Finance Launchpad, Blue Whale Finance Labs, Blue Whale Finance Charity, Blue Whale Finance DEX, Blue Whale Finance X, JEX, and fiat gateways). "Blue Whale Finance Operators" refer to all parties that run Blue Whale Finance, including but not limited to legal persons, unincorporated organizations and teams that provide Blue Whale Finance Services and are responsible for such services. "Blue Whale Finance" as used in this Privacy Notice includes Blue Whale Finance Operators.

This Privacy Notice applies to all Personal Information processing activities carried out by us, across platforms, websites, and departments of Blue Whale Finance and Blue Whale Finance Operators.

To the extent that you are a customer or user of our services, this Privacy Notice applies together with any terms of business and other contractual documents, including but not limited to any agreements we may have with you.

To the extent that you are not a relevant stakeholder, customer or user of our services, but are using our website, this Privacy Notice also applies to you together with our Cookie Notice.

This Notice should therefore be read together with our Cookie Notice, which provides further details on our use of cookies on the website. Our Cookie Notice can be accessed here (<https://www.BlueWhaleFinance.io>).

1. Blue Whale Finance Relationship with you

Blue Whale Finance (Services Holdings) Limited, a company registered at 6th Floor, South Bank House, Barrow Street, 4 Dublin, Ireland, is the data controller for personal information collected in connection with provision of Blue Whale Finance services in Europe.

However, depending on your place of legal residence certain other Blue Whale Finance entities could be involved in processing activities such as Know Your Customer ("KYC") activities which are necessary for us to provide Services to you. For example, if you are resident in France, Blue Whale Finance France SAS, is responsible for running KYC checks. These Blue Whale Finance entities could act as Controllers of your personal information and use it in accordance with this Privacy Notice.

2. What Personal Information does Blue Whale Finance collect and process? Why does Blue Whale Finance process my personal information? What is the legal basis for our use of personal information?

What personal information does Blue Whale Finance collect and process?

- email address;
 - name;
 - gender;
 - date of birth;
 - home address;
 - phone number;
 - nationality;
 - device ID;
 - a video recording of you and a photographic image;
 - transactional information;
 - the Internet protocol (IP) address used to connect your computer to the Internet;
 - login, e-mail address, password and location of your device or computer;
 - Blue Whale Finance Services metrics (e.g., the occurrences of technical errors, your interactions with service features and content, and your settings preferences);
 - version and time zone settings;
- transaction history;
- Information from other sources: we may receive information about you from other sources such as credit history information from credit bureaus;
 - Information about your activity we may process information about you on your behaviour and

your activity for marketing and advertising purposes.

Why does Blue Whale Finance process my personal information?

- Transaction services. We use your personal information to process your orders, and to communicate with you about orders and services;

- Communicate with you. We use your personal information to communicate with you in relation to Blue Whale Finance Services;

- Provide, troubleshoot, and improve Blue Whale Finance Services. We use your personal information to provide functionality, analyse performance, fix errors, and improve the usability and effectiveness of Blue Whale Finance Services.

Fraud prevention and credit risks. We process personal information to prevent and detect fraud and abuse in order to protect the security of our users, Blue Whale Finance Services and others. We may also use scoring methods to assess and manage credit risks.

Improve our services. We process personal information to improve our services and for you to have a better user experience;

- Recommendations and personalisation. We use your personal information to recommend features and services that might be of interest to you, identify your preferences, and personalise your experience with Blue Whale Finance Services;

Legal Basis for our use of personal information (EU and UK GDPR)

Performance of a contract when we provide you with products or services, or communicate with you about them. This includes when we use your personal information to take and handle orders, and process payments.

Legal obligation; to comply with our legal obligations under applicable laws and regulations, and Anti-Money Laundering laws and regulations.

Your consent when we ask for your consent to process your personal information for a specific purpose that we communicate to you. When you consent to processing your personal information for a specified purpose, you may withdraw your consent at any time and we will stop processing your personal information for that purpose. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Our legitimate interests and the interests of our users when, for example, we detect and prevent fraud and abuse in order to protect the security of our users, ourselves, or others;

Performance of a contract when we provide you with products or services, or communicate with you about them. This includes when we use your personal information to take and handle orders, and process payments.

Legal obligation; to comply with our legal obligations under applicable laws and regulations, and Anti-Money Laundering laws and regulations

Our legitimate interests and the interests of our users when, for example, we detect and prevent fraud and abuse in order to protect the security of our users, ourselves, or others;

Our legitimate interest to improve our services;

Your consent when we ask for your consent to process your personal information for a specific purpose that we communicate to you. When you consent to processing your personal information for a specified purpose, you may withdraw your consent at any time and we will stop processing your personal information for that purpose. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal

3. Can Children Use Blue Whale Finance Services?

Blue Whale Finance does not allow anyone under the age of 18 to use Blue Whale Finance Services and does not knowingly collect personal information from children under 18.

4. What About Cookies and Other Identifiers?

We use cookies and similar tools to enhance your user experience, provide our services, enhance our marketing efforts and understand how customers use our services so we can make improvements. Depending on applicable laws in the region you are located in, the cookie banner on your browser will tell you how to accept or refuse cookies. A copy of our cookie policy is available here (<https://www.BlueWhaleFinance.io>).

5. Does Blue Whale Finance Share My Personal Information?

We may share your Personal Data with third parties (including other Blue Whale Finance entities) if we believe that sharing your Personal Data is in accordance with, or required by, any contractual relationship with you or us, applicable law, regulation or legal process. When sharing your Personal Information with other Blue Whale Finance entities, we will use our best endeavours to ensure that such entity is either subject to this Privacy Notice, or follow practices at least as protective as those described in this Privacy Notice. For example, if you are resident in France, Blue Whale Finance France SAS, is responsible for running KYC checks.

We may also share personal information with the following persons:

- Third party service providers: We employ other companies and individuals to perform functions on our behalf. Examples include analysing data, providing marketing assistance,

processing payments, transmitting content, and assessing and managing credit risk. These third-party service providers only have access to personal information needed to perform their functions, but may not use it for other purposes. Further, they must process the personal information in accordance with our contractual agreements and only as permitted by applicable data protection laws.

- **Legal Authorities:** We may be required by law or by Court to disclose certain information about you or any engagement we may have with you to relevant regulatory, law enforcement and/or other competent authorities. We will disclose information about you to legal authorities to the extent we are obliged to do so according to the law. We may also need to share your information in order to enforce or apply our legal rights or to prevent fraud.

- **Business transfers:** As we continue to develop our business, we might sell or buy other businesses or services. In such transactions, user information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the user consents otherwise). Also, in the unlikely event that Blue Whale Finance or substantially all of its assets are acquired by a third party, user information will be one of the transferred assets.

- **Protection of Blue Whale Finance and others:** We release accounts and other personal information when we believe release is appropriate to comply with the law or with our regulatory obligations; enforce or apply our Terms of Use and other agreements; or protect the rights, property or safety of Blue Whale Finance, our users or others. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction.

6. International transfers of Personal Information

To facilitate our global operations, Blue Whale Finance may transfer your personal information outside of the European Economic Area (“EEA”), UK and Switzerland. The EEA includes the European Union countries as well as Iceland, Liechtenstein, and Norway. Transfers outside of the EEA are sometimes referred to as “third country transfers”.

We may transfer your personal data within our Affiliates, third-party partners, and service providers based throughout the world. In cases where we intend to transfer personal data to third countries or international organisations outside of the EEA.

Blue Whale Finance puts in place suitable technical, organizational and contractual safeguards (including Standard Contractual Clauses), to ensure that such transfer is carried out in compliance with applicable data protection rules, except where the country to which the personal information is transferred has already been determined by the European Commission to provide an adequate level of protection.

We also rely on decisions from the European Commission where they recognise that certain countries and territories outside of the European Economic Area ensure an adequate level of protection for personal information. These decisions are referred to as “adequacy decisions”. We transfer personal data to Japan on the basis of the Japanese Adequacy Decision.

7. How Secure is My Information?

We design our systems with your security and privacy in mind. We have appropriate security measures in place to prevent your information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We work to protect the security of your personal information during transmission and while stored by using encryption protocols and softwares. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of your personal information. In addition, we limit access to your

personal information to those employees, agents, contractors and other third parties who have a business need to know.

Our security procedures mean that we may ask you to verify your identity to protect you against unauthorised access to your account password. We recommend using a unique password for your Blue Whale Finance account that is not utilized for other online accounts and to sign off when you finish using a shared computer.

8. What About Advertising?

In order for us to provide you with the best user experience, we may share your personal information with our marketing partners for the purposes of targeting, modelling, and/or analytics as well as marketing and advertising. You have a right to object at any time to processing of your personal information for direct marketing purposes (see Section 9 below).

9. What Rights Do I Have?

Subject to applicable law, as outlined below, you have a number of rights in relation to your privacy and the protection of your personal information. You have the right to request access to, correct, and delete your personal information, and to ask for data portability. You may also object to our processing of your personal information or ask that we restrict the processing of your personal information in certain instances. In addition, when you consent to our processing of your personal information for a specified purpose, you may withdraw your consent at any time. If you want to exercise any of your rights please contact us at dpo@BlueWhaleFinance.io. These rights may be limited in some situations - for example, where we can demonstrate we have a legal requirement to process your personal data.

- Right to access: you have the right to obtain confirmation that your personal information are processed and to obtain a copy of it as well as certain information related to its processing;
- Right to rectify: you can request the rectification of your personal information which are inaccurate, and also add to it. You can also change your personal information in your Account at any time.
- Right to delete: you can, in some cases, have your personal information deleted;
- Right to object: you can object, for reasons relating to your particular situation, to the processing of your personal information. For instance, you have the right to object where we rely on legitimate interest or where we process your data for direct marketing purposes;
- Right to restrict processing: You have the right, in certain cases, to temporarily restrict the processing of your personal information by us, provided there are valid grounds for doing so.

We may continue to process your personal information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law;

- Right to portability: in some cases, you can ask to receive your personal information which you have provided to us in a structured, commonly used and machine-readable format, or, when this is possible, that we communicate your personal information on your behalf directly to another data controller;
- Right to withdraw your consent: for processing requiring your consent, you have the right to withdraw your consent at any time. Exercising this right does not affect the lawfulness of the processing based on the consent given before the withdrawal of the latter;

- Right to lodge a complaint with the relevant data protection authority: We hope that we can satisfy any queries you may have about the way in which we process your personal information. However, if you have unresolved concerns, you also have the right to complain to the Irish Data Protection Commission or the data protection authority in the location in which you live, work or believe a data protection breach has occurred.

If you have any questions or objection as to how we collect and process your personal information, please contact dpo@BlueWhaleFinance.io.

10. How Long Does Blue Whale Finance Keep My Personal Information?

We keep your personal information to enable your continued use of Blue Whale Finance Services, for as long as it is required in order to fulfil the relevant purposes described in this Privacy Notice, and as may be required by law such as for tax and accounting purposes, compliance with Anti-Money Laundering laws, or as otherwise communicated to you.

11. Contact Information

Our data protection officer can be contacted at BlueWhaleFinance.service@Gmail.com and will work to address any questions or issues that you have with respect to the collection and processing of your personal information.

12. Notices and Revisions

If you have any concerns about privacy at Blue Whale Finance, please contact us, and we will try to resolve it. You also have the right to contact your local Data Protection Authority.

Our business changes regularly, and our Privacy Notice may change also. You should check our websites frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account.